

WWR#041469910

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK (ALBANY)

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In Re:

KRIS DANIEL ROGLIERI,

Debtor.

Case No. 24-10157-1-REL  
Chapter 7

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**RESPONSE OF KEYBANK, N.A. TO TRUSTEE'S  
MOTION TO SELL PROPERTY**

Now comes Creditor, KEYBANK, N.A. ("Respondent") and hereby responds to Trustee's Motion to Sell Property (Doc No 403) filed on April 2, 2025, and responds as follows:

1. On April 8, 2013, Kris Daniel Roglieri (hereinafter "Debtor") executed and delivered to KeyBank, N.A. a Fixed/Adjustable Rate Note. In addition on November 6, 2018, Debtor executed and delivered to KeyBank, N.A. a Key Equity Options Agreement. Both loans were to finance the following property: 40 North Road, Queensbury, NY 12804.
2. On February 15, 2024, Debtor filed a Chapter 11 petition with this Court. On May 15, 2024 the Bankruptcy case was converted to a Chapter 7.
3. Trustee filed a Motion to Sell Property Free and Clear of Liens on April 2, 2025.
4. Respondent consents to the sale motion and recommends court approval from KeyBank's perspective.

**WHEREFORE**, KEYBANK, N.A. respectfully requests that the Debtor's Motion to Sell Property be approved.

Respectfully submitted,

/s/ Garry Masterson  
GARRY MASTERSON  
**Weltman, Weinberg & Reis Co., L.P.A.**  
5990 West Creek Road, Suite 200  
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KEYBANK, N.A.

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**CERTIFICATE OF SERVICE**

I hereby certify that on, May 5, 2025, I electronically filed the Response to Trustee's Motion to Sell Property with the Clerk of the Bankruptcy Court using the CM/ECF system which sent notification of such filing to the following:

**CHAPTER 7 TRUSTEE**

Christian H. Dribusch  
187 Wolf Road, Suite 300-20  
Albany, NY 12205

And, I hereby certify that I have mailed by the United States Postal Service the document to the following non CM/ECF participants:

Lisa M Penpraze, Attorney for U.S. Trustee  
11A Clinton Avenue, Room 620  
Albany, NY 12207

**CHAPTER 7 TRUSTEE**  
Christian H. Dribusch  
187 Wolf Road, Suite 300-20  
Albany, NY 12205

KRIS DANIEL ROGLIERI (DEBTOR)  
11 HILL TOP LANE  
POUGHKEEPSIE, NY 12207

**OFFICE OF THE U.S. TRUSTEE**  
11A Clinton Avenue, Room 620  
Albany, NY 12207

/s/ Garry Masterson

GARRY MASTERSON  
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